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December 29, 2016

VIA ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Lopez Meneses, et al. v. Wyeth, Inc., et al., 15 Cv. 09645 (JGK)

Dear Judge Koeltl,

This firm represents the Plaintiffs in the above-referenced FLSA action.

I write to request that the Court schedule a Rule 26(f) conference to set a discovery schedule in the above matter.

Defendants were previously represented by Manning & Kass, Ellrod, Ramirez, Trester LLP. That law firm moved to be relieved as counsel. After that motion was filed, the Defendants hired new counsel, Mr. Craig Benson of the Littler firm.

I write to request that the Court order discovery to proceed. I am advised that the matter may still be marked as "stayed" resulting from the earlier motion to be relieved filed by Defendants' prior counsel. I ask that the case be permitted to move forward.

While we have engaged in the settlement conference with Magistrate Judge Pitman, no settlement has been reached at this point. Unless and until a settlement is reached, we believe that the case should proceed.

Paper discovery has been exchanged and Plaintiffs wish to proceed with the depositions of all of the Defendants. Plaintiffs respectfully request that the Court direct that the Defendants be produced to be examined. We are ready to produce the Plaintiffs to be deposed by counsel for the Defendants. We request to complete all depositions by the end of January.

I have advised counsel for the Defendants that I would be making this request to the Court to vacate any "stay" of the case and move ahead with the matter.

Respectfully,

Steven B. Ross, Esq.